

September 23, 2022

VIA ECF

The Honorable William F. Kuntz, II
United States District Court Judge
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Plaintiffs #1-21 v. County of Suffolk, et al.*, Case No. 15-cv-2431 (E.D.N.Y.)

Dear Judge Kuntz:

We write on behalf of Plaintiffs and the County Defendants¹ (collectively, the “Parties”) in the above-referenced action to respectfully submit a request for an extension of the deadline to file the Individual Claims Settlement Agreement and Class Action Settlement Agreement (together, the “Settlement Agreements”), which was previously set by your Honor in the Joint Stipulation and Scheduling Order, entered on July 29, 2022 (“Order”). *See* Dkt. No. 418.

As the Court is aware, the Parties have reached an agreement in principle and are in the process of finalizing the Settlement Agreements. Given the time and resources that have been dedicated towards reaching a final settlement, the Parties request an extension of 90 days to the deadline to file the Settlement Agreements.

The Parties believe that there is good cause to extend the current deadline to file the Settlement Agreements, and that the requested extension will not unduly delay this case nor operate as a prejudice against any of the Parties.

In accordance with Your Honor’s Individual Rule I.C.5, the Parties state as follows:

- (1) The Parties seek an extension of the deadline to submit the Settlement Agreements. The Parties seek to extend the deadline by 90 days.

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed Revised Deadline</u>
Deadline to submit the Settlement Agreements	September 27, 2022	December 26, 2022

- (2) The Parties have not previously made any requests for the extension of the deadline for submission of the Settlement Agreements.
- (3) Since the Parties have not previously made any requests for the extension of the deadline for submission of the Settlement Agreements, no related requests have been granted or denied.
- (4) This request is being made with the consent of both Parties.

¹ The County Defendants are the County of Suffolk, Suffolk County Police Department, Commissioner Edward Webber, Lieutenant Milagros Soto, Supervisory John Doe Defendants, and John Doe Defendants.

We thank the Court for its attention to this matter and are available at the Court's convenience if it has any questions regarding this request.

Respectfully submitted,

By: /s/ Jose Perez

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Respectfully submitted,

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